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January 13, 2023

VIA ECFR

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS)

Dear Judge Schofield:

We write on behalf of Plaintiff Manbro Energy Corporation (“Plaintiff”) pursuant to the Court’s January 9, 2022 Order (ECF No. 301) (the “Order”) directing Plaintiff to “file a letter attaching unredacted versions of the exhibits” to the Declaration of Mark A. Kirsch in Opposition to Plaintiff’s Motions *in Limine* (ECF No. 277) (the “Kirsch Declaration”) “that Plaintiff agrees can be filed entirely on the public docket,” and “address[ing] Plaintiff’s position with respect to Exhibit A to the Kirsch Declaration.”

With respect to exhibits that Plaintiff agrees can be filed entirely on the public docket, Plaintiff attaches unredacted versions of Exhibits D and E to the Kirsch Declaration as Exhibits 1 and 2 hereto.

As to Plaintiff’s position with respect to Exhibit A to the Kirsch Declaration, Plaintiff notes that it is not the party “with an interest in confidential treatment” of information contained in the exhibit, Individual Rule I.D.3, and accordingly Plaintiff does not oppose Defendants’ request to file this exhibit under seal.<sup>1</sup>

<sup>1</sup> In the Order, the Court requests that Plaintiff attach an unredacted version of Exhibit A to the Kirsch Declaration “if Plaintiff agrees that exhibit can be filed entirely on the public docket.” For the reasons stated in this letter, and in light of Defendants’ request that the exhibit be filed under seal (ECF No. 274), Plaintiff does not attach an unredacted version of Exhibit A to the Kirsch Declaration to this letter.

The Honorable Lorna G. Schofield, p. 2

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)